



November 18, 2011

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Determination Regarding Attendance of NASA Employees at University
of Maryland Reception Honoring U.S. Representative Steny Hoyer

The Center for American Politics and Citizenship at the University of Maryland is hosting a reception to honor U.S. Representative Steny Hoyer for receiving the Millard E. Tydings Award for Courage and Leadership in American Politics the evening of November 28, 2011 at the University of Maryland's Stamp Union in College Park, Maryland. The event is being sponsored and paid for by the University of Maryland.

Approximately 125 guests are expected to attend the reception, including individuals from NASA, other Federal agencies, Congress, state and local governments, and the University of Maryland. The estimated cost per person is \$35. Attendance at the reception will allow NASA employees an opportunity to discuss with other guests issues concerning NASA's missions and programs.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Accordingly, NASA employees whose duties do not substantially affect University of Maryland may accept an invitation for free attendance to the event for themselves and their spouses or guests.

NASA employees whose duties substantially affect University of Maryland, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens", with a stylized flourish at the end.

Robert M. Stephens